## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA ORANGEBURG DIVISION

Andrew Hayes,	)
	) C.A. No. 5:15-cv-4486-JMC
Plaintiff,	)
	) CONSENT MOTION TO AMEND
v.	) SCHEDULING ORDER
	)
St. Matthews Police Department and	)
Michael Smalls, Jr., individually,	)
	)
Defendants.	)
	)

The parties move for an Order enlarging the time for discovery by 60 days and to adjust the remaining deadlines accordingly. In support of the motion, the parties offer that they have largely completed written discovery, that the parties have narrowed the witnesses to be deposed and tentatively plan to take depositions in August. The extension will allow the parties to complete discovery. A proposed Second Consent Amended Scheduling Order is being submitted to chambers for the Court's consideration.

## We so move and consent:

ATTORNEYS FOR PLAINTIFF

s/Timothy O. Lewis s/Christopher W. Johnson ALLAN R. HOLMES (FID 1925) DERWOOD L. AYDLETTE (FID 5036) TIMOTHY O. LEWIS (FID 9864) CHRISTOPHER W. JOHNSON (FID 7581) **GIBBS & HOLMES** GIGNILLIAT, SAVITZ & BETTIS, L.L.P. 900 Elmwood Ave., Suite 100 171 Church St., Suite 110 Charleston, SC 29401 Columbia, SC 29201 Tel.: (843) 722-0033 Tel.: (803) 799-9311 Fax: (843) 722-0114 Fax: (803) 254-6951 aholmes@gibbs-holmes.com daydlette@gsblaw.net timolewis@gibbs-holmes.com cjohnson@gsblaw.net

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